

FILED

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

AUG 29 2018
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,)
Plaintiff,)
v.)
JEROME WEST,)
PARISH O. HICKMAN,)
AND CHRISTEN WASHINGTON,)
Defendants.)

4:18CR730 RWS/DDN

INDICTMENT

COUNT 1

The Grand Jury charges:

A. Conspiracy

1. Beginning on or about July 11, 2017 and continuing to on or about February 28, 2018, in the Eastern District of Missouri and elsewhere, the defendants,

**JEROME WEST,
PARISH O. HICKMAN,
AND
CHRISTEN WASHINGTON**

and others, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to devise a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations, in violation of Title 18, United States Code, Section 1349.

B. **Ways, Manner, and Means of the Conspiracy**

The ways, manner and means by which the foregoing objective of the conspiracy to commit wire fraud was to be accomplished included, but were not limited to, the following:

1. The primary purpose of the conspiracy was for the defendants to profit from the passing of counterfeit checks through federally insured financial institutions.
2. It was further part of the conspiracy that defendant **PARISH O. HICKMAN** registered the fictitious name of a business, Power Auto Detailing, with the Missouri Secretary of State.
3. It was further part of the conspiracy that defendant **PARISH O. HICKMAN** applied for, and received, a taxpayer identification number and certification for Power Auto Detailing by filing Form W-9 with the Internal Revenue Service.
4. It was further part of the conspiracy that defendant **PARISH O. HICKMAN** opened a business bank account with her name, date of birth, and social security number at a federally insured financial institutions by claiming that Power Auto Detailing was her employer.
5. It was further part of the conspiracy that defendant **CHRISTEN WASHINGTON** registered the fictitious name of a business, Queens Beauty, with the Missouri Secretary of State.
6. It was further part of the conspiracy that defendant **CHRISTEN WASHINGTON** applied for, and received, a taxpayer identification number and certification for Queens Beauty by filing Form W-9 with the Internal Revenue Service.
7. It was further part of the conspiracy that defendant **CHRISTEN WASHINGTON** opened a business bank account with her name, date of birth, and social security number at a federally insured financial institutions and listing the business as Queens Beauty.

8. It was further part of the conspiracy that defendants **JEROME WEST, PARISH O. HICKMAN, CHRISTEN WASHINGTON**, and persons known to the Grand Jury deposited counterfeit checks made payable to Power Auto Detailing and Queens Beauty into the business accounts opened by **PARISH O. HICKMAN and CHRISTEN WASHINGTON**

9. It was further part of the conspiracy that defendants **JEROME WEST, PARISH O. HICKMAN, CHRISTEN WASHINGTON**, and persons known to the Grand Jury withdrew funds from the business accounts opened in the names of Power Auto Detailing and Queens Beauty, and conducted electronic transactions through use of debit cards issued to Power Auto Detailing and Queens Beauty, before the federally insured financial institution learned that the deposited counterfeit checks had not been authorized by the account holder.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2 THROUGH 6

(Bank Fraud)

1. At all times relevant to the indictment, Commerce Bank had assets insured by the Federal Deposit Insurance Corporation.

The Scheme to Defraud

2. Between on or about August 10, 2017 and continuing to on or about September 20, 2017, within the Eastern District of Missouri and elsewhere, the defendants,

**JEROME WEST AND
PARISH O. HICKMAN,**

devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

3. The scheme and artifice to defraud was in substance as follows:

- a. It was part of the scheme and artifice to defraud that defendant **PARISH O. HICKMAN**, using her name, date of birth, and social security number, opened a business checking account at Commerce Bank for Power Auto Detailing claiming to be the company's sole owner.
- b. It was further part of the scheme and artifice to defraud that the defendants **JEROME WEST AND PARISH O. HICKMAN** obtained counterfeit checks drawn on the account of Missouri Title Loans, Incorporated and made payable to Power Auto Detailing with the name **PARISH HICKMAN** appearing on the front of the check.
- c. It was further part of the scheme and artifice to defraud that the defendants **JEROME WEST AND PARISH O. HICKMAN** artificially inflated the amount available for use by depositing the counterfeit Missouri Title Loans checks into the account opened by **PARISH O. HICKMAN** at Commerce Bank. The checks were endorsed with the signature of **PARISH HICKMAN**, and listed the driver's license number issued by the State of Missouri to **PARISH OCTAVIA HICKMAN**.
- e. It was further part of the scheme and artifice to defraud that the defendants **JEROME WEST AND PARISH O. HICKMAN** utilized the artificially inflated Commerce Bank account to purchase items and obtain cash before the financial institution discovered that the payments deposited into the account were fraudulent.

4. **The Financial Transactions**

On or about the dates listed below, in the Eastern District of Missouri, the defendants,

**JEROME WEST AND
PARISH O. HICKMAN,**

executed and attempted to execute the scheme and artifice as set forth above, in that, **JEROME WEST AND PARISH O. HICKMAN** deposited the counterfeit Missouri Title Loans checks listed below into the business checking account opened by **PARISH O. HICKMAN** knowing that the checks had not been issued to Power Auto Detailing by Missouri Title Loans, Inc.,

| <u>COUNT</u> | <u>DATE</u> | <u>CHECK NUMBER</u> | <u>AMOUNT</u> |
|---------------------|--------------------|----------------------------|----------------------|
| 2 | September 13, 2017 | 144856 | \$1,200.00 |
| 3 | September 14, 2017 | 144857 | \$2,000.00 |
| 4 | September 15, 2017 | 144858 | \$4,200.00 |
| 5 | September 16, 2017 | 144859 | \$4,000.00 |
| 6 | September 19, 2017 | 144859 | \$4,000.00 |

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS 7 THROUGH 10

(Bank Fraud)

1. At all times relevant to the indictment, Commerce Bank had assets insured by the Federal Deposit Insurance Corporation.

The Scheme to Defraud

2. Between on or about January 26, 2018 and continuing to on or about February 28, 2018, within the Eastern District of Missouri and elsewhere, the defendants,

**JEROME WEST AND
CHRISTEN WASHINGTON,**

devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

3. The scheme and artifice to defraud was in substance as follows:

- a. It was part of the scheme and artifice to defraud that defendant **CHRISTEN WASHINGTON**, using her name, date of birth, and social security number, opened a business checking account at Commerce Bank for Queens Beauty claiming to be the company's sole owner.
- b. It was further part of the scheme and artifice to defraud that the defendants **JEROME WEST AND CHRISTEN WASHINGTON** obtained counterfeit checks drawn on the account of Missouri Title Loans, Incorporated and made payable to **CHRISTEN WASHINGTON**.
- c. It was further part of the scheme and artifice to defraud that the defendants **JEROME WEST AND CHRISTEN WASHINGTON** artificially inflated the amount available for use by depositing the counterfeit Missouri Title Loans checks into the business checking account opened by **CHRISTEN WASHINGTON** at Commerce Bank. The checks were endorsed with the name of **CHRISTEN WASHINGTON**.
- e. It was further part of the scheme and artifice to defraud that the defendants **JEROME WEST AND CHRISTEN WASHINGTON** utilized the artificially inflated Commerce Bank account to purchase items and obtain cash before the

federally insured financial institution discovered that the payments deposited into the account were fraudulent.

4. **The Financial Transactions**

On or about the dates listed below, in the Eastern District of Missouri, the defendants,

**JEROME WEST AND
CHRISTEN WASHINGTON,**

executed and attempted to execute the scheme and artifice as set forth above, in that, **JEROME WEST AND CHRISTEN WASHINGTON** deposited the counterfeit Missouri Title Loans checks listed below into the business checking account opened by **CHRISTEN WASHINGTON** knowing that the checks had not been issued to **CHRISTEN WASHINGTON** by Missouri Title Loans, Inc.,

| <u>COUNT</u> | <u>DATE</u> | <u>CHECK NUMBER</u> | <u>AMOUNT</u> |
|---------------------|--------------------|----------------------------|----------------------|
| 7 | February 26, 2018 | 145900 | \$4,600.00 |
| 8 | February 27, 2018 | 145902 | \$4,800.00 |
| 9 | February 28, 2018 | 145903 | \$4,700.00 |
| 10 | February 28, 2018 | 145904 | \$4,800.00 |

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNTS 11 THROUGH 13

The Grand Jury further charges that:

On or about the dates listed below, in the Eastern District of Missouri, the defendants,

**JEROME WEST AND
PARISH O. HICKMAN,**

did knowingly pass, utter, and possess the counterfeited securities listed below drawn on a Commerce Bank account in the name of Missouri Title Loans, Inc. with the intent to deceive Commerce Bank into accepting the counterfeit security as genuine,

| <u>COUNT</u> | <u>DATE</u> | <u>COUNTERFEIT SECURITY</u> | <u>AMOUNT</u> |
|--------------|--------------------|-----------------------------|---------------|
| 11 | September 14, 2017 | Commerce Bank Check 144857 | \$2,000.00 |
| 12 | September 15, 2017 | Commerce Bank Check 144858 | \$4,200.00 |
| 13 | September 16, 2017 | Commerce Bank Check 144859 | \$4,000.00 |

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNTS 14 THROUGH 16

The Grand Jury further charges that:

On or about the dates listed below, in the Eastern District of Missouri, the defendants,

**JEROME WEST AND
CHRISTEN WASHINGTON,**

did knowingly pass, utter, and possess the counterfeited securities listed below drawn on a Commerce Bank account in the name of Missouri Title Loans, Inc. with the intent to deceive Commerce Bank into accepting the counterfeit security as genuine,

| <u>COUNT</u> | <u>DATE</u> | <u>COUNTERFEIT SECURITY</u> | <u>AMOUNT</u> |
|--------------|-------------------|-----------------------------|---------------|
| 14 | February 26, 2018 | Commerce Bank Check 145900 | \$4,600.00 |
| 15 | February 27, 2018 | Commerce Bank Check 145902 | \$4,800.00 |
| 16 | February 28, 2018 | Commerce Bank Check 145903 | \$4,700.00 |

In violation of Title 18, United States Code, Sections 513(a) and 2.

COUNT 17

The Grand Jury further charges that:

On or about September 18, 2017, in the Eastern District of Missouri, the defendant,

**JEROME WEST AND
PARISH O. HICKMAN,**

did knowingly possess, transfer, and use without lawful authority, a means of identification of another person, to wit, the account number and personal identification number issued to **PARRISH O. HICKMAN**, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT 18

The Grand Jury further charges that:

On or about February 26, 2018, in the Eastern District of Missouri, the defendant,

JEROME WEST,

did knowingly possess, transfer, and use without lawful authority, a means of identification of another person, to wit, the account number and personal identification number issued to **CHRISTEN WASHINGTON**, during and in relation to the commission of the felony offense of bank fraud, Title 18, United States Code, Section 1344.

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN
United States Attorney

TRACY LYNN BERRY, #014753TN
Assistant United States Attorney